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April 29, 2020

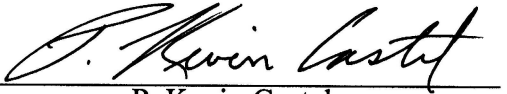
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Via ECF

The Honorable P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED.

SO ORDERED.
April 30, 2020.


P. Kevin Castel
United States District Judge

Re: *Bah v. Apple Inc., et al.*, No. 1:19-cv-03539 (PKC)

Dear Judge Castel:

We represent defendant Apple Inc. and respectfully submit this letter on behalf of all parties in the above referenced matter. The Case Management Plan and Scheduling Order, dated March 19, 2020, requires any stipulations or orders regarding the parameters of eDiscovery to be filed on or by April 29, 2020. It appears April 29, 2020 is the deadline to file the ESI Protocol. The parties are in the process of negotiating the terms of the ESI Protocol and would benefit from an additional week to try to resolve any remaining issues without the need for court intervention. Accordingly, we respectfully request a one-week extension of the deadline to file the ESI Protocol from April 29, 2020 to May 6, 2020.

This is the parties' first request to extend the deadline to file the ESI Protocol and the requested extension does not affect any of the other scheduled dates in this action. We appreciate your consideration of this request.

Respectfully submitted,

/s/ Carrie H. Cohen

Carrie H. Cohen

cc: All counsel of record (via ECF)